



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

ELM  
F. #2015R01787

*271 Cadman Plaza East  
Brooklyn, New York 11201*

July 24, 2017

By Hand and ECF

The Honorable Dora L. Irizarry  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: United States v. Dan Zhong and Landong Wang  
Criminal Docket No. 16-614 (DLI)

Dear Chief Judge Irizarry:

I am assigned to the government's filter team in the above-captioned matter and am not involved in the government's prosecution team. Pursuant to the government filter team's June 12, 2017 letter to the Court, the filter team has prepared the following update supplementing its June 12, 2017 letter and detailing the status of the review of potentially privileged documents collected or seized by the government during the course of its investigation in the above-captioned matter (the "Filter Review Materials").

To date, the government filter team made two productions of Filter Review Materials to the defendant Dan Zhong:

- A May 24, 2017 production consisting of the contents of a personal email account associated with the defendant Dan Zhong, "zhongdan515@msn.com," received as the result of a search warrant. This production contained approximately 14,950 documents.
- A July 12, 2017 production consisting of additional emails sent or received by the email account associated with the address "zhongdan515@msn.com," beyond those previously produced, received as the result of search warrants. This production contained approximately 2,207 documents.

The government filter team has also continued its review of other Filter Review Materials, excluding those emails sent to or received by the email account associated with the address "zhongdan515@msn.com." To date, the government filter team has completed first

level review of approximately 14,016 such emails, plus their attachments, and identified approximately 220 potentially privileged emails.

Out of the universe of documents reviewed by the filter team, approximately 1,573 emails sent to or received by the email account associated with the address “zhongdan515@msn.com,” and approximately 1,130 emails, plus attachments, sent to or received by other email addresses, were identified as foreign language documents in need of translation. A dedicated FBI linguist is working with the filter team to assist in its review of the foreign language documents within the Filter Review Materials.

The government filter team had hoped to be able to provide the Court in this status update with the total volume of all Filter Review Materials outstanding, but does not have the details at this time because some materials are still awaiting processing by the FBI’s Computer Analysis Response Team.

The government filter team proposes the following schedule:

- The filter team will complete a quality control review of approximately 13,000 emails, plus their attachments, designated as not privileged by the first level review team and will provide non-privileged documents from this universe to the prosecution team for review and production in accordance with the rules of discovery and any applicable protective orders.
- The filter team will continue to tailor its review of the Filter Review Materials in order to prioritize the review of those documents that are most likely to contain relevant, discoverable information. In particular, the filter team will continue to prioritize the review of any documents involving the defendants.
- The filter team will provide a further status update and updated discovery schedule to the Court at the September 6, 2017 status conference.

Respectfully submitted,

BRIDGET M. ROHDE  
Acting United States Attorney

By: /s/ Elizabeth L. Macchiaverna  
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cc: Clerk of the Court (DLI) (via ECF)